

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

KEITH RANIERE,

Defendant.

No. 18-cr-204 (NGG) (S-2)

**Date of service: March 9, 2020**

**NOTICE OF MOTION**

**ORAL ARGUMENT REQUESTED**

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law, dated March 9, 2020, the Declaration of Marc A. Agnifilo, dated March 9, 2020, and the exhibits appended to the Declaration, Defendant Keith Raniere through the undersigned attorney, Marc A. Agnifilo, will move the Honorable Nicholas G. Garaufis, United States District Judge for the Eastern District of New York, for (i) a new trial pursuant to Federal Rule of Criminal Procedure 33 and (ii) for this Court to hold a hearing to allow Raniere to call witnesses and issue defense subpoenas, and for such further relief as the Court may deem proper.

Dated:           March 9, 2020  
                  New York, NY

Respectfully submitted,

/s/

Marc A. Agnifilo, Esq.  
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